

# STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY **DEPARTMENT OF SOCIAL SERVICES**

EDMUND G. BROWN JR.
GOVERNOR

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February 7, 2018

Nick Macchione, MS, MPH, FACHE, Director San Diego County Health & Human Services Agency 1255 Imperial Avenue, Suite 446 San Diego, CA 92101

Dear Mr Macchione:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of September 11-15, 2017. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <a href="http://www.cdss.ca.gov/civilrights/PG2890.htm">http://www.cdss.ca.gov/civilrights/PG2890.htm</a>.

If you need technical assistance in the development of your CAP, please feel free to contact Elsa Vazquez at (916) 654-2110. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Civil Rights Manager

Lee Macias, Civil Rights Manager Civil Rights Unit

### Welfare to Work Division

### Enclosure

c: Jennifer Campos, Civil Rights Coordinator

Kim McCoy Wade, Chief CalFresh Policy Bureau

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# CIVIL RIGHTS COMPLIANCE REVIEW REPORT FOR

# San Diego Health & Human Services Agency Conducted on September 11-15, 2017

California Department of Social Services

Human Rights and Community Services Division

Civil Rights Bureau

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Reviewer: Elsa Vazquez

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### **CIVIL RIGHTS COMPLIANCE REVIEW REPORT**

### I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the San Diego County Health & Human Services Agency (HHSA) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted September 11-15, 2017. An exit interview was held on September 15, 2017, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5%or more)
North Central FRC	5055 Ruffin Rd, San Diego	CalWORK's & CalFresh	Spanish
Metro FRC	1130 10 <sup>th</sup> Ave, San Diego	CalFresh	Spanish
National City (AIS) FRC	401 Mile of Cars Way, National City	IHSS/APS	Spanish
Chula Vista FRC	690 Oxford, Ste. E, Chula Vista, CA	CalWORK's & CalFresh	Spanish
Call Center	1255 Imperial, 8th floor	All Programs	Spanish

### II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2017-2018 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.

Gregory K. Knoll, Executive Director Legal Aid Society of San Diego 1475 Sixth Avenue, 4<sup>th</sup> Floor San Diego, CA 92101

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

### Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	16	4
Adult Program Workers	5	4
Lobby Receptionist	6	3
Total	27	11

### **Civil Rights Coordinator and Program Manager Surveys**

Number of surveys distributed	6
Number of surveys received	6
Number of Civil Rights Coordinator survey distributed	1
Number of surveys received	1

### **Reviewed Case Files**

English speakers' case files reviewed	5
Non-English or Limited-English speakers' case files reviewed	40
Languages of clients' cases	Arabic, ASL, Bengali, Bulgarian, Cantonese Chinese, Farsi, Hmong, Japanese, Khmer, Korean, Lao, Mandarin, Oromo Portuguese, Russian, Samoan, Somali Spanish, Tagalog, Tigrinya, Oromo, Vietnamese
Reasonable Accommodation Cases	2

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

### III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and Limited-English speakers and those with impaired hearing or vision or other disabling conditions.

### A. Findings

Access to Services, Information and Outreach	Yes	No	Comments
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes		Office hours for the Family Resource Centers are 7:00 a.m 5:00 p.m. Applications can be mailed in or filed online.
Can clients, including those with disabilities, access services when unable to go to the office?	Yes		Clients can access services by Phone ACCESS/211, Benefits CalWIN and Covered California. Applicants can access services through the county website <a href="https://www.C4yourself.com">www.C4yourself.com</a> Home visits can be arranged for disabled clients.
Does the county ensure the awareness of available services for individuals in remote areas?	Yes		Outreach, Brochures, Media, Internet Website and ACCES/211

Signage, posters, pamphlets	Yes	No	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 8/16)?	Yes		
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes		Staff interviewed stated they distribute and explain the PUB 13 at intake and recertification.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes		The current version of PUB 13 was available in all languages at sites visited.
Is the Pub 13 available in large print (English and Spanish), CD, and Braille?	Yes		Each lobby reception had the PUB 13 in large print, CD, and Braille available.
Were the current versions of the required posters present in the lobbies?	Yes		All office sites visited had the required posters in their lobbies.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	Yes		

# **B.** Corrective Actions -

None

### C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	08/16
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/15

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website

http://www.cdss.ca.gov/inforesources/Civil-Rights/Your-Rights-Under-California-Welfare-Programs

### IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

# A. Findings and Corrective Actions

# 1. Facility Location: North Central FRC

Facility Element	Findings	Corrective Action
Parking	Signage on pavement does not clearly depict a wheelchair due to fading.	The parking space shall be marked with an International Symbol of Accessibilityin white on a blue background - a minimum 36" wide x 36" high. (CA T24 11B-502.6.4.1) pg. 159
	Access aisle needs repainting, "NO PARKING".	The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 166

# 2. Facility Location: Metro FRC

No findings at this facility.

# 3. Facility Location: National City (AIS)

There was no ADA facility walk thru due to AIS programs do not have public access at this facility.

# 4. Facility Location: Chula Vista FRC

Facility Element	Findings	Corrective Action
Parking	There are three areas of accessible parking at this facility:  1. Front of building 2. Left side 3. Right-east side towards back of building by park.	Parking space min. dimensions: 9' wide by 18' long. Fig 9 (CA T24 11B-502.2) (ADA 502.2) pg. 166
	*see next page.	

Facility Element	Findings	Corrective Action
-	The spaces on the Right- east side measured too narrow at 8' 6".	
	Access aisle needs to be repainted with the words "No Parking" on	The words "NO PARKING" shall be painted on the surface each access aisle.
	pavement (letters min. 12" high).	(CA T24 11B-502.3.3) pg. 166
Men's Restroom	Door pressure is excessive at 11 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows:
		1. Interior hinged doors and gates: 5 lbs. max.
		2. Sliding or folding doors: 5 lbs. max.
		3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg. 222
	Pipes under sink are not securely insulated.	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 372
		There shall be no sharp or abrasive surfaces under lava- tories and sinks. (CA T24 11B- 606.5) (ADA 606.5) pg. 372

Facility Element	Findings	Corrective Action
Women's Restroom	Door pressure is excessive at 13 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows:  1. Interior hinged doors and gates: 5 lbs. max.  2. Sliding or folding doors: 5 lbs. max.
		3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg. 222

#### a. Recommendation

None

# V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

# A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Comments
Does the county identify a client's language need upon first contact? How?	Yes		In each lobby, there is a Qmatic System for clients to pull a ticket and identify the reason for their visit. Upon signing in there is an ambassador worker who greets the client to assist with identifying their language and/or disability needs. Based on staff interviews, clients will also identify their language on the SAWS application form and Language Needs Determination Form (20-46) HHSA.
Does the county use a primary language form?	Yes		Form 20-46 HHSA
Does the client self-declare on this form?	Yes		
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes		Based on staff interviews, the worker would immediately locate a certified bilingual worker through a roster or use the language line.
After it has been determined that the client Limited-English or non-English speaking, is there a county			Based on staff interviews, the client is assigned to a bilingual worker per their

Question	Yes	No	Comments
process for procuring an interpreter?	Yes		selected language. If needed, they can also call the language line for an interpreter.
Does the county have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes		Staff interviewed stated there is a bilingual roster and a language line available.
Is there a delay in providing interpretive services?		No	
Are county interpreters certified?	Yes		Bilingual staff are certified through a verbal and written exam process.
Does the county have adequate interpreter services?	Yes		
Does the county allow minors to be interpreters? If so, under what circumstances?		No	
Does the county allow the client to provide his or her own interpreter?	Yes		If a client wants to provide their own interpreter, they are allowed but must complete Civil Rights Interpreter Confidentiality Agreement Form (20-49) HHSA.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes		
Does the county use a Release of Confidentiality Information form for client-provided interpreters?	Yes		Form 20-49
Does the county use the CDSS-translated forms in the clients' primary languages?	Yes		

Question	Yes	No	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes		
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes		If language is not available in CalWIN, the Notice of Language Services (Gen 1365) would be enclosed with the NOA.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	Yes		
Does the county identify a client with a disability (physical, mental, or learning)?	Yes		The client's disability is identified through the Qmatic System at sign in.
Does the county assist clients with self-identifying a disability?	Yes		
Does the county have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes		Based on staff interviews there were some staff that were not aware of the policy.
Does the county offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes		Based on staff interviews the county does offer reasonable accommodations.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes		Based on staff interviews, the staff would assist in reading to the clients and/or assist in filling out forms.

Question	Yes	No	Comments
Does the county offer a screening for learning disabilities?	Yes		In CalWORKs program.
Is there an established process for offering a screening?	Yes		In CalWORKs program.
Is the client identified as having a learning disability referred for an evaluation?	Yes		

### **B.** Corrective Actions

None

### VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

### A. Findings from Case File Reviews and Staff Interviews

How item is Documented Item	Adult Programs (IHSS & APS)	CalWORKs	Non- Assistance CalFresh
Ethnic origin documentation	SOC 295	CalWIN	SAWS 1, CalWIN
Method of identifying client's primary language	Form 20-46, CalWIN	Form 20-46. CalWIN	Form 20-46, SAWS 1 CalWIN
Method of documenting client's primary language	CMIPS Case narrative.	CalWIN Demographics, cases were not consistently documented	CalWIN case comments, cases were not consistently documented

How item is Documented Item	Adult Programs (IHSS & APS)	CalWORKs	Non- Assistance CalFresh
		* See below.	* See below.
Method of		CalWIN case	CalWIN case
providing		comments,	comments,
bilingual		cases were not	cases were not
services and		consistently	consistently
documentation		documented	documented
Client provided own interpreter	CMIPS case narrative, Form 20-49	None found	Form 20-49
Method to inform client of potential problem using own interpreter	CMIPS case narrative	None found	None found
Release of information to Interpreter	Form 20-49	None found	Form 20-49
Individual's	CMIPS case	Case	Case
acceptance or	narrative, Form	comments,	comments,
refusal of written material offered in primary language	2046	Form 20-46	Form 20-46
Documentation of minor used as interpreter	None found	None found	None found
Documentation of circumstances for using minor	None found	None found	None found
interpreter temporarily			

How item is Documented Item	Adult Programs (IHSS & APS)	CalWORKs	Non- Assistance CalFresh
Method of identifying client's disability	CMIPS, Assessment Form	CalWIN case comments, *See below	CalWIN case comments, *See below
Method of documenting clients' disability (physical, mental, or learning)	CMIPS case narrative	CalWIN case comments, *See below	CalWIN case comments, *See below
Method of offering a reasonable accommodation to the client with disability	CMIPS case narrative	CalWIN case comments	CalWIN case comments
Method of documenting clients' reasonable accommodation	CMIPS case narrative	CalWIN case comments	CalWIN case comments

# **B.** Corrective Actions

Areas of Action	Corrective Action
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language.  Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.  Div. 21-116.22

Areas of Action	Corrective Action
Documentation of a disability	San Diego County Health & Human Services Agency shall ensure that case record is documented upon obtaining information that identifies an applicant/recipient as disabled. San Diego County Health & Human Services Agency shall document, in writing, an applicant's/recipient's request for services.  Div. 21-116.3
General	San Diego County Health & Human Services Agency must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

#### C. Recommendation

In review of cases in CalWIN & CMIPS systems, the reviewer came across a couple of discrepancies; such as system indicator's that are not being used/coded in demographics detail. The indicator is to identify if a "Translator" is needed. Staff are not marking anything. The reviewer was informed that if a bilingual worker is handling the case, there is no need to mark the need for a "Translator".

It is recommended that bilingual workers should check "Yes" on the CalWIN demographics "Translator" indicator, when asked if the clients require interpreter services. The bilingual worker providing services in the client's primary language is considered the interpreter. Also, if the interpretive services are being provided by the language line.

Further, the reviewer also came across another indicator "Disability" in the CalWIN system that is not being used, this indicator was rolled out in May 2016, however, HHSA has not instructed staff to use. The reviewer recommends staff be instructed to use the indicator to identify a client's case with a disability (Div. 21-116.3).

#### VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504, and ADA training for all public contact employees, including familiarization with the discrimination

complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

### A. Findings

Interview questions	Yes	No	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes		All staff interviewed stated they receive annual training through Learning Management System (LMS).
Do employees receive continued Division 21 Training?	Yes		All staff interviewed stated they receive annual training through Learning Management System (LMS).
Do employees understand the county policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes		Staff are aware and understand the county's policy and procedure to follow if a client wants to file a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	Yes		
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes		
Does the county provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes		Based on staff interviews all staff responses were they receive trainings on how to identify clients with disabilities.
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes		Per staff interviews, all staff state they receive annual trainings through Learning Management System (LMS).
Do the employees understand the county policy regarding a client's right to a reasonable accommodation?	Yes		

### **B.** Corrective Actions

None

### **VIII. DISCRIMINATION COMPLAINT PROCEDURES**

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

# A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes		Staff interviewed were able to identify the differences between complaints.
Do the employees know who the Civil Rights Coordinator is?	Yes		All staff interviewed knew who their Civil Rights Coordinator is.
Do the employees know the location of the Civil Rights poster "Everyone is Equal (Pub 86)" with information as to how and where the clients can file a discrimination	Yes		All staff interviewed were aware of the location of the Civil Rights poster (PUB 86).
complaint? When reviewing the complaint log with the Civil Rights Coordinator,			
was it complete and up to date?	Yes		

### **B.** Corrective Action

None

### IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

#### A. Contracts Review

Number of Contracts Reviewed	6
Number of Contracts w/Assurance of Compliance Agreement	6

### **B.** Corrective Action

None

### X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

# A. Findings from Call/Service Center site visit and interviews.

Question	Yes	No	Comments
Does the county have a Call			Access & A2Health
Center/Service Center?	Yes		Customer Service Center
Is the Call Center/Service Center			
publically accessible to clients?		No	
Does the Call Center/Service Center			Calls are answered for the
answer calls for the entire county, by	Voc		entire county.
district, or regional office?	Yes		
Does the Call/Service Center have			
an Interactive Voice Response system?	Yes		
3,5.5			
If so, does the Interactive Voice			Spanish, Arabic,
Response system have language			Vietnamese and Tagalog.

Question	Yes	No	Comments
Does the county have a Call Center/Service Center?	Yes		Access & A2Health Customer Service Center
options for all county threshold languages?	Yes		
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?	Yes		Access & A2H staff can assist and communicate to the Family Resource Centers with any accommodations needed for applicants/recipients.
Is the Call/Service Center accessible to clients with a disability (hearing impaired, physical, mental, or learning)?	Yes		Access & A2H has a TDD- Hearing Impaired phone line to assist hearing impaired applicants/recipients. Staff can also read information or correspondence to the visual impaired by phone.
Are the Call/Service Center calls monitored for quality assurance?	Yes		
Does the Call/Service Center staff provide services to client's individual case?	Yes		

### A. Corrective Action

None

### XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

\*No feedback was received.

### XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Diego County Health & Human Services Agency Civil Rights Compliance Plan for the period September 1, 2017 through August 31, 2018, was received on July 10, 2017. It is approved as submitted.

### XIII. CONCLUSION

The CDSS reviewer found San Diego County Health & Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Jennifer Campos, Civil Rights Coordinator, for organizing the details of the review, and to John Peterson, Facilities Manager, who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found San Diego County Health & Human Services Agency in substantial (partial, or not in compliance, satisfactory, full) compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The San Diego County Health & Human Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.